

# Exhibit F



Deposition of:  
**Robert McMeeking, Ph.D.**

*July 19, 2016*

In the Matter of:  
**Clare Austin vs. C.R. Bard**

**Tiffany Alley, A Veritext Company**  
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1 fracture.

2 Q So there's a lot of different combinations --

3 A Yes.

4 Q -- that could happen -- that could come  
5 together in a perfect storm to either cause a 12:27:19  
6 complication, yes?

7 A I wouldn't call it a perfect storm. I would  
8 say that there are circumstances that can come  
9 together and --

10 MR. O'CONNOR: Belated objection to the form 12:27:26  
11 of the question.

12 THE WITNESS: -- and that a design of a  
13 filter should be such that it minimizes the -- the  
14 impact of those combinations to a very significant  
15 extent so that the fracture is almost -- is almost 12:27:42  
16 eliminated completely from the performance of the  
17 filter.

18 BY MS. DALY:

19 Q Okay. And it has never been your opinion,  
20 has it, that an IVC filter can be designed that is 12:27:52  
21 absolutely complication free?

22 MR. O'CONNOR: Object to the form of the  
23 question.

24 THE WITNESS: I've not -- if I did -- if I  
25 expressed that opinion in the past, I have changed 12:28:10

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1 my opinion.

2 BY MS. DALY:

3 Q Okay. What is your opinion?

4 A Because my thinking is that you can design a  
5 vena cava filter that eliminates the kind of 12:28:19  
6 complications we are talking about, such as tilt,  
7 such as fracture, such as migration.

8 Q And as far as you know, nobody has developed  
9 that filter yet; true?

10 A Well, certainly the one I've -- 12:28:35

11 MR. O'CONNOR: Form and foundation.

12 THE WITNESS: -- the one I've thought up, no,  
13 I haven't seen it.

14 BY MS. DALY:

15 Q And nobody has created an IVC filter that is 12:28:41  
16 complication free, have they? No company?

17 MR. O'CONNOR: Form and foundation.

18 THE WITNESS: I'm not sure. I don't -- I  
19 don't have the data.

20 BY MS. DALY:

21 Q Have --

22 A But -- but there are filters which have less  
23 complications in regard to fracture, tilt and  
24 migration, such as the Simon Nitinol filter.

25 Q And what is that based on, that you say that 12:29:04